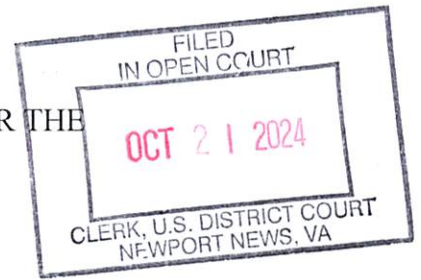


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Newport News Division



UNITED STATES OF AMERICA)

v.)

KRISTOPHER ARMON WARREN,)
a/k/a "\$core" and "Saucegod,")
(Counts 1-36))

MONTRELL D'ANGELO NORMAN,)
a/k/a "Trell,")
(Counts 1, 9, 11-13, 16, 28-30, 32-35))

and)

ERIC RANDY DAVIS,)
a/k/a "Bill")
(Counts 1, 9, 11-14, 16, 28-35))

Defendants.)

CRIMINAL NO. 4:24-cr-72

18 U.S.C. § 1349
Conspiracy to Commit Bank Fraud
(Count 1)

18 U.S.C. §§ 1344 and 2
Bank Fraud
(Counts 2-16)

18 U.S.C. §§ 641 and 2
Theft of Government Property
(Count 17)

18 U.S.C. §§ 1001 and 2
False Statements Within Jurisdiction
of Agency the United States
(Counts 18-21)

18 U.S.C. §§ 513(a) and 2
Making, Uttering, and Possessing
Forged Securities of a Private Entity
(Counts 22-30)

18 U.S.C. §§ 1028A and 2
Aggravated Identity Theft
(Counts 31-35)

18 U.S.C. §§ 1704 and 2
Unlawful Possession of Postal Keys
(Count 36)

18 U.S.C. §§ 492, 981(a)(1)(C), and
982(a)(2)(A); 28 U.S.C. § 2461(c)
Criminal Forfeiture

INDICTMENT

October 2024 Term – at Newport News, Virginia

GENERAL ALLEGATIONS

At all times relevant:

1. KRISTOPHER ARMON WARREN, a/k/a “\$core” and “Saucegod,” MONTRELL D’ANGELO NORMAN, a/k/a “Trell,” and ERIC RANDY DAVIS, a/k/a “Bill,” resided in Norfolk, Virginia, in the Eastern District of Virginia.

2. Navy Federal Credit Union, Bank of America, JP Morgan Chase, and Bay Port Credit Union are financial institutions, as defined in Title 18, United States Code, Section 20. Bay Port Credit Union and Navy Federal Credit Union are credit unions with accounts insured by the National Credit Union Share Insurance Fund. Bank of America and JP Morgan Chase are insured by the Federal Deposit Insurance Act.

3. AstenJohnson Inc., Bullseye International, LLC, John Hand LLC, The J.J. Trust, Lendmark Financial Services, Meridian Mechatronics, LLC, Media Power Advertising, Utility Pipe Sales of In, Inc., and Utility Pipe Sales Co. are organizations that operate in and affect interstate and foreign commerce, as defined in Title 18, United States Code, Section 513(b).

4. The United States Postal Service (“USPS” or “Postal Service”) is an independent federal agency headquartered in Washington, D.C., with a universal service obligation to provide postal service in all areas and communities of the United States. The USPS has the largest retail network in the United States and provided postal services to more than 152 million residential delivery points and almost 13 million business ones, with almost 140,000 blue collection boxes in use nationwide in 2022, including throughout the Eastern District of Virginia. In addition to its letter and package delivery services, the USPS also provides financial services by way of postal money orders, more than 66 million of which it issued in 2022, and governmental services, like processing passport applications. It is the largest postal service in the world, delivering almost half (44%) of the world’s total mail volume last year.

5. Since 2022, USPS has hardened the collection box inventory across the country against traditional fishing-related mail theft, wherein thieves “fish” letters through mail slots to steal, for instance, checks to “wash” them to enter new amounts and payees, or others’ personal and financial information for use in identity theft and financial fraud schemes.

6. While such hardening has made traditional collection box fishing more difficult, the United States Postal Inspection Service (USPIS) has seen an increase in the theft of “arrow keys,” the master keys authorized USPS personnel use to access the variety of mail repositories, including blue collection boxes, outdoor parcel lockers, cluster box units, and apartment panels, all of which serve as authorized depositories and collection points for postal service matters within the meaning of Title 39, United States Code, Section 102. The functionality of arrow keys is subject to limits, including specified geographic restrictions that limit the functionality of a given arrow key series to collection boxes in a defined area.

7. These keys are sold for thousands of dollars on the black market, as criminals seek to acquire them to facilitate the theft of U.S. Mail in connection with other lucrative criminal schemes, like check fraud and identity theft.

OBJECT OF THE SCHEME AND ARTIFICE TO DEFRAUD

8. The object of the scheme and artifice to defraud was for WARREN, NORMAN, and DAVIS and their coconspirators to fraudulently obtain funds to which they were not entitled through a number of illicit means, to include negotiating counterfeit and fraudulent checks at banks and credit unions and utilizing fraudulent access devices to withdraw United States currency.

WAYS, MANNER, AND MEANS OF THE CONSPIRACY

9. Conspirators stole or otherwise unlawfully obtained United States Mail through a variety of means, to include the use of stolen or otherwise misappropriated United States Postal Service "Arrow" keys, which unlock all Postal Service blue collection boxes within a given

geographic area. Blue collection boxes often contain mailings that consist of personal and business checks, United States currency, money orders, financial institution access devices (such as credit and debit cards), and other personally identifiable information.

10. Conspirators repurposed stolen checks – either through creating new check templates that incorporated the personal and financial information contained on the original check (to include the payor's name and address, as well as the account number and routing number), or replacing the name of the designated payee on the original check with the name of a conspirator or accomplice.

11. Conspirators obtained funds from financial institutions via the negotiation of these fraudulent checks through a number of means. One of those means was a practice known as "card cracking," a four-prong process that typically proceeds as follows:

- a. conspirators obtain the bank account information of a frequently complicit third party (to include that bank account holder's Automated Teller Machine (ATM) card and accompanying Personal Identification Number (PIN)), usually on the understanding that the account holder will receive a future cash payment in exchange for these materials;
- b. conspirators obtain the personal information and bank account information of a victim (to include the victim's bank account number and routing number) – typically through direct mail theft, or the purchase of such previously-stolen information offered for sale on various social media and online platforms;
- c. conspirators create a counterfeit check (as noted above, either utilizing check printing software, or through physical alteration of pre-existing checks) that purports to have been drafted by the victim on victim's actual checking account, and made payable to the complicit third party;

- d. conspirators, using the complicit third party's ATM card and accompanying PIN, deposit the counterfeit check at an ATM machine and then-following the bank's acceptance of that counterfeit check, and crediting of the complicit third party's account-withdraw the cash that the bank makes available.

12. It was further part of the conspiracy that conspirators utilized the credit cards, debit cards, and personal identifying information of other individuals that the conspirators obtained through their mail thefts and misappropriations to access the bank accounts of the legitimate account holders and withdraw funds from those accounts via ATM and Interactive Teller Machine (ITM) transactions. The misappropriated credit and debit cards possessed and utilized by the conspirators constituted "access devices" and "unauthorized access devices" as those terms are defined at Title 18, United States Code, Sections 1029(e)(1) and (3), respectively.

13. Further, conspirators used at least one person's personally identifying information to apply for a loan in the name of that individual. The person then paid the conspirators a percentage of the proceeds obtained via the loan.

14. Throughout the course of the conspiracy, the conspirators possessed and utilized the names, dates of birth, Social Security numbers, addresses, and banking information of other individuals in the form of stolen checks, stolen credit and debit cards, and stolen mail containing personally identifiable information. These purloined items constituted means of identification of those other individuals, as that term is defined at Title 18, United States Code, Section 1028(d)(7). The conspirators also possessed and utilized the names, ATM cards, and PINs of the above described complicit third parties, each of which independently constituted a means of identification of those persons, as that term is defined at Title 18, United States Code, Section 1028(d)(7).

COUNT ONE
(Conspiracy to Commit Bank Fraud)

THE GRAND JURY CHARGES THAT:

Between a date unknown, but believed to be no later than in or about August 2021, and continuing until in or about at least September 2023, the exact dates being unknown, in the Eastern District of Virginia and elsewhere, KRISTOPHER ARMON WARREN, a/k/a “\$core” and “Saucegod,” MONTRELL D’ANGELO NORMAN, a/k/a “Trell,” and ERIC RANDY DAVIS, a/k/a “Bill,” the defendants herein, along other conspirators known and unknown, did knowingly and willfully combine, conspire, confederate and agree with each other and others known and unknown, to commit the following offense against the United States: to knowingly execute and attempt to execute the aforesaid scheme and artifice to defraud and to obtain money, funds, assets, securities, and other property owned by and under the custody and control of a financial institution as defined under Title 18, United States Code, Section 20, by means of materially false and fraudulent pretenses, representations and promises in violation of Title 18, United States Code, Section 1344.

(In violation of Title 18, United States Code, Sections 1349 and 1344.)

COUNT TWO THROUGH SIXTEEN
(Bank Fraud)

THE GRAND JURY FURTHER CHARGES THAT:

1. The factual allegations set forth in the General Allegations are incorporated herein as if set out in full.

2. On or about the dates and in the matter set forth below, in the Eastern District of Virginia and elsewhere, KRISTOPHER ARMON WARREN, a/k/a “\$core” and “Saucegod,” MONTRELL D’ANGELO NORMAN, a/k/a “Trell,” and ERIC RANDY DAVIS, a/k/a “Bill,” the defendants herein, aided and abetted by others, along with other conspirators known and unknown, did knowingly and willfully attempt to execute a scheme and artifice to defraud a financial institution and to obtain the moneys, funds, credits, assets, securities, and other property owned by and under the custody and control of a financial institution, by means of the materially false and fraudulent pretenses, representations, and promises, as set forth below:

Defendant	Count	Date (on or about)	Description of Transaction
WARREN	2	August 9-10, 2021	WARREN, aided and abetted by others known and unknown, negotiated a counterfeit check (last four digits 9557) in the amount of \$1,990.90 drawn against the business bank account of AstenJohnson and made two cash withdrawals of \$1,000.00 and \$750.00 from Navy Federal Credit Union in Norfolk
WARREN	3	April 8-9, 2022	WARREN, aided and abetted by others known and unknown, negotiated a counterfeit check (last four digits 0786) in the amount of \$3,401.82 drawn against the business bank account of Bullseye International, LLC, and made two cash withdrawals of \$1,000.00 from a Navy Federal Credit Union ATMs in Norfolk

WARREN	4	February 15-24, 2022	WARREN, aided and abetted by others known and unknown, negotiated a counterfeit check (last four digits 1063) in the amount of \$9,483.90 drawn against the bank account of J.J. Trust and made two cash withdrawals of \$1,200.00 and \$1,500.00 from Bank of America in Norfolk.
WARREN	5	August 22-27, 2022	WARREN, aided and abetted by others known and unknown, negotiated a counterfeit check (last four digits 1722) in the amount of \$10,000.00 drawn against the business bank account of John Hand LLC and made a cash withdrawal of \$1,500.00 from a Bank of America in Norfolk.
WARREN	6	August 23-25, 2022	WARREN, aided and abetted by others known and unknown, negotiated a counterfeit check (last four digits 5333) in the amount of \$6,929.37 drawn against the business bank account of Lendmark Financial Services and made two cash withdrawals of \$1,000.00 from Navy Federal Credit Union in Norfolk and Virginia Beach.
WARREN	7	September 28, 2022	WARREN, aided and abetted by others known and unknown, negotiated a counterfeit check (last four digits 2252) in the amount of \$30,299.65 drawn against the business bank account of Meridian Mechatronics, LLC, and attempted to withdraw funds under the custody and control of Navy Federal Credit Union.
WARREN	8	January 20, 2023	WARREN, aided and abetted by others known and unknown, negotiated three counterfeit checks (last four digits 9592, 9594, and 9588) at Bayport Credit Union in the amounts of \$375.00, \$1,441.80, \$433.36 drawn against the business bank account of K&K Contracting, and purchased three money postal money orders from a Norfolk post office made payable to WARREN and J.S.

WARREN, NORMAN, and DAVIS	9	May 8-22, 2023	WARREN, NORMAN, and DAVIS aided and abetted by others known and unknown, negotiated a counterfeit check (last four digits 3328) in the amount of \$54,000.00 drawn against the business bank account of Media Power Advertising and made a series of cash withdrawals from JP Morgan Chase in Norfolk and Woodbridge
WARREN	10	May 18, 2023	WARREN, aided and abetted by others known and unknown, negotiated a counterfeit check (last four digits 5605) in the amount of \$25,702.30 drawn against the business bank account of TBG Madison LLC (last four 5605) and made two cash withdrawals of \$3,000.00 and \$1,000.00 from JP Morgan Chase in Norfolk
WARREN, NORMAN, and DAVIS	11	July 27, 2023 – August 5, 2023	WARREN, NORMAN, and DAVIS, aided by others known and unknown, negotiated a counterfeit check (last four digits 5939B) in the amount of \$16,806.75 drawn against the business bank account of Utility Pipe Sales of In, Inc. and made a cash withdrawal of \$3,000.00 from JP Morgan Chase in Williamsburg.
WARREN, NORMAN, and DAVIS	12	July 27, 2023 – August 5, 2023	WARREN, NORMAN, and DAVIS, aided and abetted by others known and unknown, negotiated a counterfeit check (last four digits 0836) in the amount of \$37,656.80 drawn against the business bank account of Utility Pipe Sales Co. and made a cash withdrawal of \$3,000.00 from JP Morgan Chase in Williamsburg.
WARREN, NORMAN, and DAVIS	13	July 27, 2023 – August 5, 2023	WARREN, NORMAN, and DAVIS, aided and abetted by others known and unknown, negotiated a counterfeit check (last four digits 5033) in the amount of \$14,781.51 drawn against the business bank account of Dover Plumbing Supply Company and made a cash withdrawal of \$3,000 from JP Morgan Chase in Williamsburg.
WARREN and DAVIS	14	August 14, 2023 – August 23, 2023	WARREN and DAVIS, aided and abetted by others known and unknown, negotiated a counterfeit check (last four digits 5242) in the amount of \$23,415.66 drawn against the business bank account of Homewood Retirement Centers, Inc. and made two cash withdrawals of \$1,000.00 from JP Morgan Chase in Vienna.

WARREN	15	August 23, 2023	WARREN, aided and abetted by others known and unknown, purchased \$2,000.00 of postal money orders from a United States Post Office in Richmond, which were made payable to WARREN and drawn against the same JP Morgan Chase account that he negotiated the counterfeit check in the amount of \$23,415.66 from Homewood Retirement Centers, Inc.
WARREN, NORMAN, and DAVIS	16	September 13-28, 2023	WARREN, NORMAN, and DAVIS, aided and abetted by others known and unknown, negotiated a counterfeit check (last four digits 6856) in the amount of \$137,771.05 drawn against the business bank account of Ambrose Group, Inc., and made a series of cash withdrawals from JP Morgan Chase in Williamsburg, Norfolk, Alexandria, and Mechanicsville.

(In violation of Title 18, United States Code, Sections 1344 and 2.)

COUNT SEVENTEEN
(Theft of Government Property)

THE GRAND JURY FURTHER CHARGES THAT:

1. The factual allegations contained in the General Allegations section are incorporated herein by reference as if set out in full.

2. Between on or about June 26, 2020, and July 7, 2020, in the Eastern District of Virginia and elsewhere, KRISTOPHER ARMON WARREN, a/k/a “\$core” and “Saucegod,” the defendant herein, aided and abetted by S.M., and along with other conspirators known and unknown to the Grand Jury, willfully and knowingly did steal, purloin, and convert to his use without authority, money aggregating in excess of \$1,000.00 belonging to the United States of America, to wit, a Paycheck Protection Program (PPP) loan in the amount of \$20,833.00, which was made in response to the COVID-19 outbreak, which the defendant and S.M. were not entitled to receive.

(In violation of Title 18, United States Code, Sections 641 and 2.)

COUNTS EIGHTEEN THROUGH TWENTY-ONE
(False Statements Within Jurisdiction of an Agency of the United States)

1. The factual allegations contained in the General Allegations section are incorporated herein by reference as if set out in full.

2. On or about the dates and in connection with the loan applications set forth below, in the Eastern District of Virginia and elsewhere, KRISTOPHER ARMON WARREN, a/k/a “\$core” and “Saucegod,” the defendant herein, aided and abetted by others, and along with other conspirators known and unknown to the Grand Jury, did knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, to wit: the defendant made false statements in a matter within the jurisdiction of the United States Small Business Administration (SBA) by making false statements on a loan application for a Paycheck Protection Program (PPP) loan guaranteed by the SBA, as follows.

Defendant	Count	Date (on or about)	False Statement
WARREN	18	May 27, 2021	WARREN, aided and abetted by others known and unknown, falsely claimed that S.M. had a sole proprietorship called S.M. that operated a miscellaneous retailer.
WARREN	19	May 27, 2021	WARREN, aided and abetted by others known and unknown, falsely claimed that S.M.’s sole proprietorship earned \$120,000.00 in in Tax Year 2020.
WARREN	20	May 27, 2021	WARREN, aided and abetted by others known and unknown, claimed that S.M. established her sole proprietorship on January 1, 2019.
WARREN	21	May 27, 2021	WARREN, aided and abetted by others known and unknown, falsely claimed that S.M. would use the loan to cover payroll costs for the sole proprietorship.

(In violation of Title 18, United States Code, Sections 1001 and 2.)

COUNT TWENTY-TWO THROUGH THIRTY

(Making, Uttering, and Possessing Counterfeit Securities of a Private Entity)

THE GRAND JURY FURTHER CHARGES THAT:

1. The factual allegations set forth in the General Allegations are incorporated herein as if set out in full.

2. On or about the dates and in the manner set forth below, in the Eastern District of Virginia, KRISTOPHER A. WARREN, a/k/a “Score” and “Saucegod,” MONTRELL NORMAN, a/k/a “Trell,” and ERIC DAVIS, a/k/a “Bill,” the defendants herein, aided and abetted by others known and unknown, and along with other conspirators known and unknown to the Grand Jury, did knowingly make, utter, and possess forged securities of private entities, with intent to deceive other private organizations.

Defendant	Count	Date (on or about)	Description of Forged Security
WARREN	22	August 9, 2021	WARREN, aided and abetted by others known and unknown, made, uttered, and possessed a counterfeit business check (last four digits 9557) drawn against the business bank account of AstenJohnson, and made payable to I.R. in the amount of \$1,990.90.
WARREN	23	April 8, 2022	WARREN, aided and abetted by others known and unknown, made, uttered, and possessed a counterfeit business check (last four digits 0786) drawn against the business bank account of Bullseye International, LLC, and made payable to victim A.J. in the amount of \$3,401.82.
WARREN	24	February 15, 2022	WARREN, aided and abetted by others known and unknown, made, uttered, and possessed a counterfeit check (no. 1063) drawn against the bank account of J.J. Trust, R.J. Trustee, and F.H. Trustee and made payable to victim T.R. in the amount of \$9,483.90.

WARREN	25	August 22, 2022	WARREN, aided and abetted by others known and unknown, made, uttered, and possessed a counterfeit business check (no. 1722) drawn against the business bank account of John Hand LLC and made payable to victim L.B. in the amount of \$10,000.00.
WARREN	26	August 23, 2022	WARREN, aided and abetted by others known and unknown, made uttered, and possessed a counterfeit business check (last four digits 5333) drawn against the business bank account of Lendmark Financial Services and made payable to K.L. in the amount of \$6,929.37.
WARREN	27	September 28, 2022	WARREN, aided and abetted by others known and unknown, made uttered, and possessed a counterfeit business check (last four digits 2252) drawn against the business bank account of Meridian Mechatronics, LLC and made payable to A.A. In the amount of \$30,299.65.
WARREN, NORMAN, and DAVIS	28	May 17, 2023	WARREN, NORMAN, and DAVIS, aided and abetted by others known and unknown, made, uttered, and possessed a counterfeit business check (last four digits 3328) drawn against the business bank account of Media Power Advertising and made payable to R.D. in the amount of \$54,000.00.
WARREN, NORMAN, and DAVIS	29	July 27, 2023	WARREN, NORMAN, and DAVIS, aided and abetted by others known and unknown, made, uttered, and possessed a counterfeit business check (last four digits 5939B) drawn against the business bank account of Utility Pipe Sales of In, Inc., and made payable to J.C. in the amount of \$16,808.75.
WARREN, NORMAN, and DAVIS	30	July 27, 2023	WARREN, NORMAN, and DAVIS, aided and abetted by others known and unknown, made, uttered, and possessed a counterfeit business check (last four digits 0836) drawn against the business bank account of Utility Pipe Sales Co. and made payable to B.N. in the amount of \$37,656.80.

(In violation of Title 18, United States Code, Sections 513(a) and 2.)

COUNTS THIRTY-ONE THROUGH THIRTY-FIVE
(Aggravated Identity Theft)

THE GRAND JURY FURTHER CHARGES THAT:

1. The factual allegations set forth in the General Allegations are incorporated herein as if set out in full.

2. On or about the dates set forth herein, in the Eastern District of Virginia, KRISTOPHER A. WARREN, a/k/a “\$core” and “Saucegod,” MONTRELL NORMAN, a/k/a “Trell,” and ERIC DAVIS, a/k/a “Bill,” the defendants herein, aided and abetted by others known and unknown, and along with conspirators known and unknown to the Grand Jury, did unlawfully, knowingly, and intentionally use, without lawful authority, a means of identification of another during and in relation to felony violations of provisions in Chapter 63 of Title 18, to wit: conspiracy to commit bank fraud, in violation of Title 18, United States Code, Section 1349; and bank fraud, in violation of Title 18, United States Code, Section 1344.

Defendant	Count	Date (on or about)	Means of Identification	Description of Transaction	Felony Violation
WARREN, and DAVIS	31	August 14, 2023	Personal identifiers of victim C.M., including name, date of birth, and social security number	Use of a means of identification of C.M. to negotiate counterfeit business check (last four digits 5242) drawn against the business bank account of Home-wood Retirement Centers, Inc.	18 U.S.C. §§ 1349, 1344 (ref. Counts 1 and 14)
WARREN, NORMAN, and DAVIS	32	July 27, 2023	Personal identifiers of victim J.C. including his name, date of birth, and social security number.	Use of a means of identification of J.C. to negotiate counterfeit business check (last four digits 5939B) drawn against the	18 U.S.C. §§ 1349, 1344 (ref. Counts 1 and 11)

				business bank account of Utility Pipe Sales of In, Inc.	
WARREN, NORMAN, and DAVIS	33	July 27, 2023	Personal identifiers of victim B.N. including his name, date of birth, and social security number.	Use of a means of identification of B.N. to negotiate counterfeit business check (last four digits 0836) drawn against the business bank account of Utility Pipe Sales Co.	18 U.S.C. §§ 1349, 1344 (ref. Counts 1, 12)
WARREN, NORMAN, and DAVIS	34	July 27, 2023	Personal identifiers of victim R.D. including his name, date of birth, and social security number.	Use of a means of identification of R.D. to negotiate counterfeit business check (last four digits 5033) drawn against the business bank account of Dover Plumbing Supply Company.	18 U.S.C. §§ 1349, 1344 (ref. Counts 1, 13)
WARREN, NORMAN, and DAVIS	35	September 13-28, 2023	Personal identifiers of victim J.H., including his name, date of birth, and social security number.	Use of a means of identification of J.H. to negotiate counterfeit business check (last four digits 6856) drawn against the business bank account of Ambrose Group	18 U.S.C. §§ 1349, 1344 (ref. Counts 1, 16)

(In violation of Title 18, United States Code, Section 1028A and 2.)

COUNT THIRTY-SIX
(Unlawful Possession of Postal Keys)

1. The factual allegations contained above are incorporated herein by reference as if set out in full.

2. On or about June 26, 2023, in Newport News in the Eastern District of Virginia and elsewhere, KRISTOPHER ARMON WARREN, a/k/a “\$core” and “Saucegod,” the defendant herein, aided and abetted by others known and unknown, did unlawfully possess a postal key, that is, any key suited to any lock adopted by the Post Office Department or the Postal Service and in use on any of the mails or bags thereof, or any key to any lock box, lock drawer, or other authorized receptacle for the deposit or delivery of mail matter – with the intent unlawfully or improperly to use, sell, and otherwise dispose of the same and to cause the same to be unlawfully and improperly used, sold, and otherwise disposed of.

(In violation of Title 18 U.S.C., Sections 1704 and 2)

FORFEITURE

THE GRAND JURY FURTHER FINDS PROBABLE CAUSE THAT:

1. The defendants, if convicted of any of the violations alleged in Counts One through Sixteen of this Indictment, shall forfeit to the United States, as part of sentencing pursuant to Federal Rule of Criminal Procedure 32.2, any property constituting, or derived from, proceeds obtained directly or indirectly, as the result of the violation.

2. The defendants, if convicted of the violation alleged in Count Seventeen of this Indictment, shall forfeit to the United States, as part of sentencing pursuant to Federal Rule of Criminal Procedure 32.2, any property, real or personal, which constitutes or is derived from proceeds traceable to the violation.

3. The defendants, if convicted of any of the violations alleged in Counts Twenty-Two through Thirty of this Indictment, shall forfeit to the United States, as part of sentencing pursuant to Federal Rule of Criminal Procedure 32.2:

- a. Any property, real or personal, which constitutes or is derived from proceeds traceable to the violation; and
- b. All counterfeits of any coins or obligations or other securities of the United States or of any foreign government, and any articles, devices, or other things made, possessed, or used in violation of 18 U.S.C. § 470 et seq., or any material or apparatus used or fitted to intended to be used, in the making of such counterfeits, articles, devices, or things, which were possessed without proper authority.

4. If any property that is subject to forfeiture above is not available, it is the intention of the United States to seek an order forfeiting substitute assets pursuant to Title 21, United States Code, Section 853(p) and Federal Rule of Criminal Procedure 32.2(e.).

(In accordance with Title 18, United States Code, Sections 492, 981(a)(1)(C), and 982(a)(2)(A); Title 28, United States Code, Section 2461(c).)

UNITED STATES v. KRISTOPHER ARMON WARREN, et al.
4:24-cr-72

Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office.


A TRUE BILL:

REDACTED COPY

FOREPERSON

Jessica D. Aber
United States Attorney

By:



D. Mack Coleman
Assistant United States Attorney
Eastern District of Virginia
11815 Fountain Way, Suite 200
Newport News, Virginia 23606
Phone: (757) 591-4000
Fax: (757) 591-0866
Email: mack.coleman@usdoj.gov